



ASSOCIATION OF
PUBLIC-SAFETY
COMMUNICATIONS
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INTERNATIONAL, INC.

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MONTANA CHAPTER

1404 South Bozeman Avenue
Bozeman, Montana 59715-5646
November 21, 2002

Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Reference: WT Docket No. 02-285 RM-10077, Amendment of Sections 90.20 and 90.175 of the Commission's Rules for Frequency Coordination of Public Safety Frequencies in the Private Land Mobile Below 470 MHz Band.

The Montana Chapter of APCO supports the proposal that any of the four public safety frequency coordination agencies be allowed to coordinate any of the public safety pool channels below 470 MHz. Currently, this is the process for 800 MHz public safety channels. We feel that this procedure is appropriate for establishing a unified approach to public safety frequency coordination, particularly in light of the recognized need for interoperability among all public safety agencies/responders.

The Montana Chapter currently, through its Montana Frequency Coordinator (local advisor to APCO AFC, Inc.), has significant responsibilities for frequency coordination. A unified approach to frequency coordination would greatly simplify the process, particularly in situations in which a public safety agency applies for a frequency normally coordinated by a coordinator not normally associated with that applicant's function (e.g., a police agency applying for a channel previously reserved for, say, highway maintenance).

The State of Montana is currently planning the future implementation of a statewide public safety radio system that will incorporate virtually all public safety functions: law enforcement; fire; EMS; highway; forests and public lands; etc. The planning process involves federal, state and local agencies. Simplification of the coordination process would expedite both the implementation of the plan and the ability for public safety agencies, particularly at the state and local level, to participate in the plan. The Montana Chapter of APCO is deeply involved in the planning process through the participation of numerous members of the Chapter in the Montana Public Safety Communications Council/Statewide Interoperability Executive Council and its Technology Committee.

We encourage the Commission to approve the Competitive Coordination Petition.

Sincerely,


William J. Jameson
President, Montana Chapter, APCO

cc: Mr. Thomas Sugrue, Chief
FCC Wireless Telecommunications Bureau

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